

## Elliott Greenleaf

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September 13, 2017

### Via Email and Regular Mail

Magistrate Judge Martin C. Carlson  
Ronald Reagan Federal Bldg. & U.S. Courthouse  
228 Walnut Street  
Harrisburg, PA 17108-0983  
magistrate\_judge\_carlson@pamd.uscourts.gov

**Re: Julie Ellen Wartluft f/k/a Julie Ellen Bartels and Frederick L. Bartels, Jr., Individually and as Administrators of the Estate of Abrielle Kira Bartels, Deceased v. Milton Hershey School, et al.**  
**Civil Action No. 1:16-cv-2145-CCC (M.D. Pa.)**

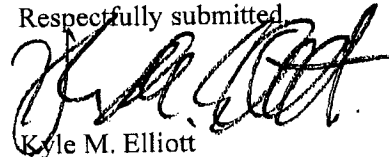
Dear Judge Carlson:

Our firm represents Defendants in the above-referenced action filed by Plaintiffs Julie Ellen Wartluft f/k/a Julie Ellen Bartels, and Frederick L. Bartels, Jr., Individually and as Administrators of the Estate of Abrielle Kira Bartels ("AB"), Deceased (collectively, "Plaintiffs"). On March 23, 2017, Defendants served a subpoena to produce documents, information, or objects on the Pennsylvania Psychiatric Institute ("PPI"). PPI is represented by Richard C. Seneca, Esquire, whom is copied on this letter.

We have engaged in discussions with Attorney Seneca, in conjunction with counsel for Plaintiffs, and all parties and PPI have agreed to the enclosed proposed Qualified Protective Order directing PPI to comply with the document subpoena by producing AB's medical records. For ease of reference, we are also enclosing the subpoena served on PPI.

Defendants respectfully request that the Court enter the attached proposed Qualified Protective Order. We are available to discuss the proposed Qualified Protective Order at the Court's convenience.

Respectfully submitted



Kyle M. Elliott

/kme

Enclosures

(via email)

cc: Jarad W. Handelman, Esquire  
Richard C. Seneca, Esquire  
Gregory F. Cirillo, Esquire  
John J. Higson, Esquire  
Kevin J. Neary